AT

DES MOINES BARREL AND DRUM COMPANY

DES MOINES, IOWA

EPA I.D. NUMBER: Withdrawn

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division (ARWM), a RCRA compliance evaluation inspection was performed at Des Moines Barrel and Drum Company in Des Moines, Iowa, on April 16, 1984. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

P. ARTICIP ANTS

Des Moines Barrel and Drum Company: Virgil C. Smith, President

Iowa Department of Water, Air and Waste Management: Cynthia Turkle, Environmental Specialist

U.S. Environmental Protection Agency (EPA): Jo Lynne Moore, Environmental Scientist John W. Bosky, Environmental Engineer

INSPECTION PROCEDURE

Mr. Virgil C. Smith, proprietor of Des Moines Barrel and Drum Company, was notified on Friday via telephone prior to the inspection to assure his presence during the inspection on Monday. As agreed to during our telephone conversation, I met Mr. Smith in his office, accompanied by Ms. Turkle and Mr. Bosky. I introduced myself, presenting Mr. Smith with my EPA credentials, and introduced Mr. Bosky. I provided Mr. Smith with a RCRA Inspection Confidentiality Notice, which he read and returned to me unsigned, stating that there was nothing confidential about his operations. The inspection consisted of a discussion of process procedures, waste generation and a tour of the facility and surface impoundment.



PROCESS DESCRIPTION

Des Moines Barrel and Drum operates four days a week, eight hours a day, employing six workers and one semi-trailer driver. The facility recycles and reconditions 200-300 open and closed head drums a day. The number of drums recycled is limited by the resale market. Of all recycled drums, 99% are 55-gallon steel drums. The facility also recycles smaller steel drums, and sells plastic and cardboard drums and drum liners. Mr. Smith regularly receives drums from companies that generate wastes such as ink, varnish, resin and paint.

The reconditioning of a drum consists of a closed head process, an open head process and a painting process. These processes operate independently according to the workload.

Drums that cannot be reconditioned are crushed by the Alter Metal Company and sold as scrap metal.

Closed Head Process

The residue in a closed head drum is removed by placing a steel chain inside the drum and rolling the drum through a caustic solution (pH=9.5). The steel cutting chain is reused as is the caustic solution.

The 80,000-gallon caustic tank is cleaned twice a year by pumping the caustic solution into a holding tank and removing the sludge from the bottom of the tank. The caustic tank is approximately 60'x6', and Mr. Smith estimated that the accumulated sludge is two inches in depth. According to this information, approximately eight 55-gallon drums of sludge would be generated per tank cleaning. Mr. Smith estimated that the cleaning process generated about three 55-gallon drums of sludge "flake" which is disposed by spreading on the facility property (Photograph, frame #10).

As the closed head drums are removed from the caustic bath, they are placed upside down to drain. The caustic solution drains into the tank (Photograph, frame #11).

When the caustic solution has drained from the drum, the drum is physically moved to a flushing area. Sixteen drums are rinsed inside and outside with water. The rinse water drains into a tank under the flushing area. The collection tank is drained daily into a sump which discharges to the city sewer (Photograph, frame #12 and 13).

The insides of the drums are dried, ten at a time, using a vacuum. The water collected in the vacuum also drains to the city sewer via the sump.

The drums are then pressure tested at 10 psi and dried at 450°F in a natural gas oven. The drum is then light tested.

Once the drum has passed the pressure and light test, it is bunged up and the outside is shot blasted in a "wheel-a-brator". The SAE size #230, steel shot eventually breaks down to a powder. The paint dust and steel dust is collected in a baghouse, located outside of the building. As the fabric bags become full, the dust is put into 55-gallon drums and stored on the premises.

An undeterminable quantity of steel dust was visible on the dirt floor around the "wheel-a-brator".

Open Head Process

The head of the drum is cut off and the metal edge is bent down to form a new lip. The residue in the open drums is incinerated at 1500°F in a natural gas flame. The drums are cooled by water spray. The incineration process does not reduce all of the residue to ash. The sludge and unevaporated cooling water drain freely from the incinerator into the adjacent surface impoundment. The quantity of sludge generated per unit of time could not be determined.

When the drums are cool, they are shot blasted on the inside and outside in the "wheel-a-brator". After being shot blasted, the drums are painted.

Painting Process

Des Moines Barrel and Drum has two paint booths which are used separately for painting the outside of the drums and coating the interior of the drums.

Interior Coating

The epoxy-phenolic coating purchased from Mobil Chemicals is applied inside the drum if specified by the customer. The coating is sprayed on in a dry filter booth and baked, in the same oven used to dry the closed head drums.

The paint booth is cleaned every two months by replacing the paper filters. The used filters are burned in the flame incinerator.

The spray paint gun is cleaned with methyl ethyl ketone (MEK). Excess MEK is used as thinner for the coating, which is volatilized during baking or eventually burned as overspray on the filters.

Exterior Paint

The drum body and head are spray painted in the same dry filter booth and air dried. Drum heads are painted white and the body is painted either black or blue. The white, black and blue paint is an unleaded paint purchased from Mobil Chemicals.

The spray paint booth is cleaned every month. The paper filters are either sent to the local landfill or burned in the flame incinerators.

Toluene, used to clean the spray paint gun, is collected in a drip pan under the paint booth and reused as paint thinner.

FINDINGS AND OBSERVATIONS

- 1. Mr. Smith said that he does not accept any drums containing hazardous waste. Mr. Smith does know that drums containing a herbicide or pesticide, (acute toxic wastes) must be triple rinsed and that all other drums containing hazardous waste must have less than one inch of residue to be classified as "empty". Mr. Smith told us that he sent a statement to each of his suppliers stating that he would only accept "empty" drums. When Des Moines Barrel and Drum picks up empty drums, the interior is not inspected, but Mr. Smith said he would not hesitate to leave a drum he thought was not empty. Drums stored at the facility to be recycled were labelled according to DOT regulations.
- 2. During the inspection, Mr. Smith indicated a particular area on the ground where the flake (sludge) from cleaning the caustic bath was spread. The soil did not appear to have a noticeable quantity of flake mixed with the soil (Photograph, frame #10). As mentioned previously, the amount of flake generated per cleaning is about eight 55-gallon drums. Ms. Turkle of the Iowa Department of Water, Air and Waste Management, sampled the soil in this area on 2/27/84. According to the laboratory analysis, the soil sample did not exceed EP toxicity limits; however, it was not determined if this soil sample was representative of the caustic flake (Attachment #1).
- 3. At the time of the inspection, the facility was not operating. The State of Iowa intends to sample the caustic rinse water that is discharged to the city sewer when the flushing area is in operation. Ms. Turkle has attempted to obtain a sample on several occasions, but the flushing area was not operating each time she was at the facility.
- 4. As mentioned in the description of the painting process, all paint and coating overspray filters are landfilled or incinerated. Since toluene and MEK are reused for thinner, no measurable quantities of spent solvent are generated from the painting or coating of drums.
- 5. Sludge is generated from the incineration process because all drum residue is not reduced to ash. The sludge and runoff cooling water flow freely from the incinerator to the adjacent surface impoundment. The appearance of the surface impoundment resembles an overflowing excavated hole. Mr. Smith said that the deepest part of the lagoon was next to the incinerator and was probably eight feet in depth. I estimate the lagoon to be about 10'x20'. Mr. Smith did not know the exact size of the lagoon, and it could not be determined, since the sludge was overflowing into the weeds on the property. The sludge is viscous and inconsistent in color.

At the time of the inspection, the lagoon contents were confined to facility property, but the liquid could easily be washed off the facility property to the street storm sewer with rainwater (Photograph, frame #3, 4 and 5-7).

On February 27, 1984, Ms. Turkle collected a sludge sample from the edge of the lagoon. The laboratory analysis indicated that the sludge did not exceed EP toxicity limits (Attachment #2). The sludge sample analyzed cannot be assumed representative of the accumulated lagoon sludge because of the nature of the sludge and the location where the sample was collected.

- 6. Waste oil was noticed on the ground in puddles of water across from the office. Tractor-trailers are parked in this area of the driveway (Photograph, frame #9).
- 7. About twenty partially filled 55-gallon steel drums were observed in a pile across from the office just off of the driveway. The drums were in poor condition, rusted, open, punctured, etc. Mr. Smith did not know what was in the drums or where the contents came from. Mr. Smith said that he thought the drums contained red ink residue or possibly sludge from the lagoon which was cleaned out in 1980. He had assumed the waste in the drums to be non-hazardous (Photograph, frame #1, 2 and 8).

The drum contents were tested by the State on 2/27/84. The laboratory analysis determined the composite drum residue sample to be hazardous by lead and chromium characteristics (Attachment #3).

Des Moines Barrel and Drum was storing hazardous waste without proper authorization pursuant to 40 CFR 265. Knowing the results of the drum residue analysis, prior to the RCRA compliance inspection, Mr. Smith made preliminary arrangements to: repackage the residue, dispose of the residue at Blackhawk Waste Disposal in Waterloo, Iowa and, clean and crush the drums for proper disposal (Attachment #6).

CONCLUSIONS

The gaustic sludge (flake) and the rinse water to remove the caustic solution from the drums has not been analyzed for hazardous characteristics prior to disposal.

The accumulated sludge in the lagoon has not been adequately sampled for analytical analysis. The contents of the lagoon should be contained to prohibit rainwater from washing the lagoon contents off of the property.

The pile of hazardous waste in deteriorating drums should be stored and disposed of in accordance with 40 CFR 265.

An inspection performed on 2/27/84 by Ms. Turkle indicated that 12 more drums with similar contents might be located elsewhere on the facility's property. Although no other partially filled drums were observed during the inspection, the existence of more drums should be confirmed (Attachment #5).

Jo Lynnel Moore

Environmental Scientist

Date:

Activity Number: AT51

Robert B.

Chief, Field Investigations Section

Date: may 8, 1984

Attachments:

Lagoon Sludge Analysis. (2 pages)
Caustic Flake Soil Analysis. (2 pages)

Drum Residue Analysis. (2 pages)

Facility Diagram.

State Inspection Report (2 pages)

Mr. Smith's letter to the State NOV

Confidentiality Statements Photographs (13 pages)

H.A. Wallace Building, East Ninth and Frand Des Moines, Iowa 50319 (515)281-5371

Request for Hazardous Waste Analysis

Submittor: <u>C</u>	indy Turkle		Agen cy:	I DWAWM #5	
Address: Wa	llace Buildin	g, 5th Floor			
Contact Person:	Cindy Tur	kle	Telephor	e Number:	
Bill to: Exe	mpt				
Sample Collecto	or: <u>Cindy Tur</u>	rkle	Sampling	Date: 2/27/84	Time:
Collection Site	e: <u>Des Moines</u>	Barrel & Dru	m Storage	Container: _G	lass jar
Type of Waste:	Sludge		·		
Source of Waste	e: Pond				·
• ,	•	rage Requireme		tory (particul	arly if hazardous
,					
Laboratory Sample Number	Submittor Sample Number	Analys	sis Requested	٠.	
4-11466	Χ	E.P.	. Toxicity (on	ly metals)	
				-	
				·	
		·		<i>i</i>	
		FOR LABORATO	RY USE ONLY		
Received by: _	R. White		Date:	2/27/84	·
Comments:					
					
					

Date Receiv

2/27/84

Extraction Procedure (EP) Toxicity Characteristics

Contaminant	mg/L EP Extract	mg/kg Extracted from Sample	Maximum Concentration of Contaminant Allowable in Extract (Ref: 40CRF261.24)(mg/L)
Arsenic	<0.50	<10	5.0
Barium	<10	<200	100.0
Cadmium	<0.10	<2.0	1.0
Chromium	<0.50	<10	5.0
Lead	<0.50	<10	5.0
Mercury	<0.02	<0.40	0.2
Selenium	<0.10	<2.0	1.0
Silver	<0.50	<10	5.0
Endrin			0.02
Lindane			0.4
Methoxychlor			10.0
Toxaphene		· · · · · · · · · · · · · · · · · · ·	0.5
2,4,D	·	 ·	10.0
2,4,5-TP (Silvex)			1.0
romium (Hexavalent)*	<0.05	<1.0	• .
Copper*	0.02	0.20	
Zinc*	8.4	170	, in the second
Fluoride*	·		
Nitrate (as NO ₃)*		· - · · · · · · · · · · · · · · · · · ·	
pH (Units)	5.0		
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*Analyses required by the Iowa Departm All analyses in accordance with: Test Physical Chemical Methods, EPA SW-846 Methods.	t Metho	ds for	Evaluat	ing Solid W	lastes.	d
Total Cyanide in Sample*	mg/kg	Total	Phenols	in Sample	t	mg/kg
Analysts: <u>SSB, ESA, ML</u> Comments:			· · · · · · · · · · · · · · · · · · ·			
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iew by: LAF	······································		Date	Reported:	::57.1.3	1984

WJ Hausler, Jr., Ph.D. Director

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H.A. Wallace Building, East Ninth and G of Des Moines, Iowa 50319 (515)281-5371

Request for Hazardous Waste Analysis

Submittor: 🕙	Cindy Turkle		Agency: <u>IDWAWM #5</u>	
Address:	Wallace Buildir	ng. 5th Floor		·
Contact Person:	<u>Cindy Turkle</u>	· · · · · · · · · · · · · · · · · · ·	Telephone Number:	
Bill to:	Exempt			
Sample Collecto	r: <u>Cindy Turk</u>	le	Sampling Date: 2/27/84	Time:
Collection Site	: <u>Des Moines Ba</u>	rrel & Drum	Storage Container:	
Type of Waste:	· 			·
Source of Waste	: Drum washer d	ump site		
Special Handlin waste):	g and/or Storage	Requirements	in Laboratory (particular	ly if hazardous
~	Submittor Sample Number	Analysis	Requested	
4-11467	Y	E.P. To:	xicity (only metals)	
				
			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
	FOR	R LABORATORY U	SE ONLY	
Received by: _	R White		Date: <u>2/27/84</u>	
Comments:				
				

WJ Hausler, Jr., Ph.D. Director

Extraction Procedure (EP) Toxicity Characteristics

Contaminant	mg/L EP Extract	mg/kg Extracted from Sample	Contaminar Extract (F	oncentration of t Allowable in Ref: 40CRF261.24) mg/L)
Arsenic	<0.50	<10		5.0
Barium	<10	<u> </u>		100.0
Cadmium	0.18	3_6		1.0
Chromium	0.50	<10	•	. 5.0
Lead	2.5	50		5.0
Mercury	<0.02	<0.40	·	0.2
Selenium	<0.10	<2.0		1.0
Silver	<0.50	<10		5.0
Endrin				0.02
Lindane,				0.4
Methoxychlor		·		10.0
Toxaphene				0.5
2,4,D	<u> </u>			10.0
2,4,5-TP (Silvex)				1.0
Chromium (Hexavalent)*	<0.05	<1.0		
Copper*	0.09	1.8	-	
Zinc*	46	920	•	,
Fluoride*			٠	
Nitrate (as NO ₃)*				
pH (Units)	5.3		• •	
*Analyses required by the All analyses in accordance Physical Chemical Methods.	nce with: Te	st Methods for Evalu	ating Solid W	astes.
Total Cyanide in Sample	*	_ mg/kg Total Pheno	ls in Sample*	mg/kg
Analysts:SSB, ESA, I	ML			
•				
				·
Review by: LAF		Da	te Reported:	MAR 1 3 1984

2/84

H.A. Wallace Building, Last Ninth and Grand Des Moines, Iowa 50319 (515)281-5371

Request for Hazardous Waste Analysis

Submittor: Des Moines Barrel & Drum	Agency:
Address: S.E. 19th & Scott	
Contact Person: Virgil C. Smith	Telephone Number: 515:266-5121
Bill to: Des Moines Barrel & Drum	
Sample Collector:Cindy Turkle	Sampling Date: 2/27/84 Time:
Collection Site: Des Moines Barrel & Drum	Storage Container: Glass jar
Type of Waste: <u>Residue</u>	
Source of Waste: Drum	
Special Handling and/or Storage Requirements i waste):	
·	
Laboratory Submittor Sample Sample Number Number Analysis Re	quested
11468 Z EP Toxicity	(metals only)
FOR LABORATORY USI	E ONLY
Received by: R. White	Date: 2/27/84
Comments: Mr. Smith requested a copy of resul	ts be sent to Ms. C. Turkle, 1DMAMM #5, as
per telephone contact	

Extraction Pr dure (EP) loxicity Characteris cs.

t ann n an t	mg/L EP Extract	mg/kg Extracted from Sample	Maximum Concentration Contaminant Allowable Extract (Ref: 40CRF26 (mg/L)	e in
senic	<0.50	<10	5.0	
rium	<10	<200	100.0	
dmium	0.36	7.2	1.0	
romium	8.8	180	5.0	
ad	21	420	5.0	
rcury	0.03	0.60	0.2	
elenium	<0.1	<2.0	1.0	
lver	<0.5	<10	5.0	·
ndrin			0.02	
ndane			0.4	
ethoxychlor			10.0	
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,4,D			10.0	•
,4,5-TP (Silvex)			1.0	
mromnum (Hexavalent)*	<0.05	<1.0		
0" *	0.39	7.8		
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lupride*				
itrate (as NO ₃)*				
H (Units)	5.2			
Analyses required by that it analyses in accorda hysical Chemical Metholethods.	nce with: Te	est Methods for Evalu	and Waste Management. Pating Solid Wastes. 982, or the EPA Approved	d
otal Cyanide in Sample	*	mg/kg Total Pheno	ols in Sample*	mg/kg
nalysts: <u>SSB, ESA,</u>	ML	· .	,	
omments:			·	· · · · · · · · · · · · · · · · · · ·
eview by: LAF		Da	ate Reported: <u>Map 1 3</u>	1984
(84		W.	J Hausler, Jr., Ph.D.	

IOWA DEPARTMENT OF WATER, AIR AND WASTE MANAGEMENT Report Of Investigat Page 1 01 2

	TOWA DEPARTMENT OF WATER
INVESTIGATION DATE Current 2-27-84/1-17-84met 3-08-83	FROM: AIR AND WASTE MANAGEMENT (U Regional Office #5 Stamp) Henry A. Wallace Building
TO: (Facility Name, Location & Address) Vingil Smith	900 E. Grand Des Moines Jowa 50319 0032 Persons Contacted (Name & Position)
Des Moines Barrel and Drum S.E. 19th & Scott Des Moines, IA 50317	Persons Contacted (Name & Polition) Virgil Smith
RE:(Specify investigation Purpose Or Cite Rule)	

OBSERVATIONS/RECOMMENDATIONS

Hazardous Waste

This facility reconditions used drums by two methods. The closed head drums are washed in a tank containing a caustic solution. This cleaning bath is reused: however, accumulated bottom sludge is deposited on site.

The rinse water following the caustic tank is dumped down the City sewer. Reportedly, the rinse is not caustic, but this is the first and only rinse in this process. Sampling of this discharge is necessary, but was not done during these inspections due to the process not being operated.

Open head drums are put through a burner with the waste volatilizing or flowing into a ponded area next to the unit. Unevaporated cooling water sprayed on the hot drums also flows into this pond. Any overflow appears to travel south along the facility's property, but may eventually reach a storm drain in the street. No overflow was observed during these inspections.

The pond from the burn operation was reportedly cleaned in September of 1980. down to a clay layer. The pond was relined with fly ash prior to its use. The pond was reportedly 10-12 ft. deep and is currently almost full. An estimated 20,000 lbs. of sludge has been accumulated in the pond.

A pile of drums has been stockpiled on site. These are believed to contain burner processing sludge wastes from operations that occurred seven years ago under a previous owner. The drums, about 30 in number, are very rusty, crushed, with much of their contents spilled on the ground. Some of the contents have solidified, some are dirt-like in consistency and some are "gooey". About twelve more drums are reported to be located elsewhere on the property, containing similar waste.

A sample, taken randomly from several of these drums, significantly exceeded the E.P. toxicity limit for chromium and lead. A sample taken randomly from the sludge around the burn unit and pond did not exceed the limits. A sample of

SUSPENSE DATE	Signature	Date
	Inapector, Cynthia Lykle Environmental Specialist	3/23/84
	Regional Administrator Clemen, P. E.	3/23/84
Enclosures (Specify	<i>i</i>) ()	,

Istribution: Regional Office: Central Office: Inspected Facility

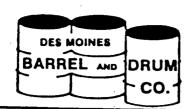
WAWM form 57 (Jul 1, 83) (Replaces DEQ form RP 5, which may not be used)

Report of Investigation Des Moines Barrel and Drum Work Request Hazardous Waste CT

March 23, 1984 Page 2 of 2

the soil where the caustic tank sludge is reportedly dumped also did not exceed the E.P. toxicity limits.

This report will be referred to the Department's central office staff for the appropriate action.



DEALERS & RECONDITIONERS OF BARRELS & DRUMS

PAILS & CONTAINERS

S.E. 19TH & SCOTT

DES MOINES, IOWA 50317

515/266-512

DISTR.

JWC

VACK W CLIMENS P.F. REGIONAL ADMINISTRATOR

IOWA DEPT OF WATER HIR Y WASTE MANAGEMENT 900 EAST GRAND PES MOINES IA 50319

DEAR MR CLIMENS

MEETING - APRIL 13, 1984 10:00 A.M

THANK YOU FOR YOUR STAFFS TIME AND ATTENTION TO MY PROBLEMS

I'M STUDYING THE PROPOSED PLAN TO ECINAMIE THE WASTE WATER PROBLEM. TESTING AND ENGINEERING WORK IS NECESSARY SO PLEASE ALCOW TIME FOR THIS.

THE HAZARDOUS WHSTES WILL BE REMOVED FROM THE SITE AND PLIKED IN APPROVED LAND FILL WITHIN 30 DAYS

Virgil O Smith

ac 71m Oechnoc, ROD VLIEGER, CYNTHIA TURKE

RECEIVED

APR 1 6 1984

IOWA DEPT. OF WATER, AIR AND WASTE MANAGEMENT

" Sanitar Pined Drums for the Good Andustry"

Notice of Violation Pursuant to P rements of Resource Conservation and Rec y Act (RCRA). TO: Facility Name: EPA ID Nbr: Date: During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified: Citation Description of Violation This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection. is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106. The corrective actions taken by _______ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated. If you have any questions on this Notice or wish to discuss your response you may call _____ (U.S. EPA) at 816/374-330 , or target of them. fir and thest (steel), at 1000 to 1000 This Notice prepared by _____ Date _____ The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same. Printed Name: 1/4/ Date Signature: Distribution: inal-Facility Rep. t...k -AWCM Yellow -ENSV Green -State

U.S. ENVIRONMENTAL PROTECTION AMENCY

BERA INSPECTION CONFIDENTIALITY MOTICE

Name and Address of Inspector(s)	Name and Address of Facil	1127	
Ur Lynne Moore	Dis Moines BARR	c/4	
U.S. E.P.A. Rg. VH	Drum Co.	-	
ENSV Div.	5. E 19"1 / Smoth 700	Alone.	Z 20 20
25 Funston Road	Owner, Operator, or Agent	in Charge	50317
Kansas C. Yr. KS 66115			
Ransas City, No 66/13	Title		
	President		
	Address		
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here of Individual to Mnom Notice	711)e	Date	
Given			
Virgil Sith	·	'	

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the freedom of Information Act (FDIA), 5 U.S.C. 352; EPA regulations issued thereunder, 41 EFA Part 2; and the Resource Conservation and Recovery Act, Section 3007, EPA is required to make inspection data available in response to FOIA requests, whiless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above governing EPA's treatment of confidential information. Among other trings, the regulations require that the EFA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed itemets all of the following criteria:

- Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
- 2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
- The information is not publicly available elsewhere.
- 4. Disclosure of the information would cause substantial harm to your sempany's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you make claims that some or all of the information is confidential and meets the four criteria listed above.

U.S. ENVIRONMENTAL PROTECTIO', ACENCY

MERA INSPECTION CONFIDENTIALITY MOTICE

have and Address of Inspector(s)	Name and Address of Facility	7
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Kansas City, KS 66115	Title	-
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- 3. The information is not publicly available elsewhere.
- 4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you member claims that some or all of the information is confidential and meets the four criteria listed above.

REED IN . .. IIDII CONTINENTIALITE MOTIEL

FOCITIES

If you are not authorized by your company to make confidentiality claim. This motice will be sent by certified mail, along with the receipt for doctories, samples, and other materials, to the Owner, Operator, or Agent in the statement, appetition of this date. That person must return a statement, specifying any information which should receive confidential treatment.

The statement from the Owner, Operator, or Agent in Charge should be ad-

Mr. David A. Wagoner
Director. Air and Waste Management Division
United States Environmental Protection Agency
24 E. 11th Street
Ransas City, Missouri 64106

and mailed by registered, return-receipt requested mail within sever (7) calendar days of receipt of this Motice.

Failure by your firm to submit a writter request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in Charge, within the seven—day period, will be treated by the EPA as a waiver by your company of any claim for confidentiality reporting the inspection data.

To be completed by the facility of	Ittal meaching and
I have received and read this Botic	a secretaring this Actice:
Name	
Title	
Signature	
Date	
If there is no one or the premises a business confidentiality claims for other inspection	of the facility who is authorized to make the firm, a copy of this hotice and ent to the Owner, Operator, or Agent in another company official who should also ignate below:
Barre	
Title	
Address	
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The mirrording on outside tisting was keed up the South and that give back on he stated what he had nothing to claim.

If you are not authorized by your company to make confidentiality claim, this motice will be sent by certified mail, along with the receipt for doctowns, samples, and other materials, to the Owner, Operator, or Agent in turn a statement, specifying any information which should receive confidential treatment.

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Failure by your fire to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official recediting this Actice:
I have received and read this Motice.
Name
Title
\$1 gnature
Date
If there is no one or the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Actice and other inspection materials will be sent to the Quiner, Orerator, or Agent in charge of the company. If there is another company official who should also become this information, please designate below:
Name
ittle
udress.

the first of the same services.

B261 W









